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LATHAM & WATKINS LLP

June 18, 2024

VIA ECF

The Honorable Arun Subramanian
United States District Court
Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street, Courtroom 15A
New York, NY 10007-1312

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Re: *Leifer v. Live Nation Entertainment, Inc. et al.*; 1:24-cv-03994-AS-SLC
Defendants' Unopposed Letter-Motion for Extension of Deadlines

Dear Judge Subramanian:

Pursuant to Rule 3.E. of Your Honor's Individual Practices in Civil Cases, Defendants Live Nation Entertainment, Inc. and Ticketmaster L.L.C. (together, "Defendants") respectfully ask the Court to extend the time for Defendants to file a responsive pleading or motion in response to Plaintiff Abraham Leifer's Class Action Complaint (ECF No. 1) by 45 days, up to and including August 9, 2024. In addition, in the event that Defendants file a motion in response (including a motion to compel arbitration), the parties request an extended briefing schedule allowing Plaintiff 45 days to file the opposing memoranda of law and allowing Defendants 21 days to file the reply memoranda of law. In support of this request, Defendants state as follows:

The original deadline for Defendants' response is June 25, 2024. There have been no previous requests for adjournment or extension sought or granted in this case.

Defendants seek this extension in order to give them enough time to collect relevant information regarding Plaintiff's use of Defendants' services and/or purchase of products or services sold, distributed, issued, or serviced by or through Defendants in order to determine the appropriate response to Plaintiff's Complaint, including whether to file a motion to compel arbitration or a motion to dismiss.

Plaintiff consents to this extension, provided that an extended briefing schedule is permitted as described above. Defendants agree to this extended briefing schedule.

The parties are scheduled to appear before the Court for the Initial Pretrial Conference on September 6, 2024 at 11:00 AM. There are currently no other existing deadlines.

In addition, pursuant to Rule 2.A. of Your Honor's Individual Practices in Civil Cases, Defendants designate Timothy L. O'Mara (*pro hac vice* forthcoming) as Lead Trial Counsel.

LATHAM & WATKINS^{LLP}

Respectfully submitted,

By: /s/ Anna M. Rathbun
Anna M. Rathbun (*pro hac vice* pending)
Of LATHAM & WATKINS LLP
*Attorneys for Defendants Live Nation
Entertainment, Inc. and Ticketmaster L.L.C.*

cc: All Counsel of Record (via ECF)

Application GRANTED. The Clerk of Court is directed to terminate the motion at ECF No. 15.

SO ORDERED.



Arun Subramanian, U.S.D.J.
Date: June 20, 2024